

United States District Court for the District of Puerto Rico

09 SEP 14

Joseph Betancourt, INDIVIDUALLY, next <sup>to</sup> ~~EXECUTOR'S OFFICE~~  
of Manuel Betancourt, AND AS <sup>U.S. DISTRICT COURT  
SAN JUAN</sup> EXECUTOR <sup>OF THE ESTATE OF</sup> Friends  
of Manuel Betancourt

Complaint 09-1932 (SEC)

Trial Demanded

v.

Kings Harbor Multicare Center Alexander Stern  
Vincent Marchello, M.D., Daniel McMahon, Shirley McLellan,  
Director of Nursing Ms. Feigelbaum Alan Kopman,  
Witt, P.N., ~~Dolce~~ Head of Security.

TO THE ABOVE NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED TO ANSWER THE COMPLAINT IN THIS ACTION AND TO SERVE A COPY OF YOUR ANSWER, OR, IF THE COMPLAINT IS NOT SERVED WITH THE SUMMONS, TO SERVE A WRIT OF APPEALANCE, ON THE PLAINTIFF'S ATTORNEY WITHIN TWENTY (20) DAYS AFTER THE SERVICE OF THIS SUMMONS, EXCLUSIVE OF THE DAY OF SERVICE, ON OR BEFORE (30) DAYS AFTER THE SERVICE IS COMPLETE IF THIS SUMMONS IS NOT PERSONALLY DELIVERED TO YOU WITHIN THE STATE.

Plaintiff Joseph Betancourt individually and as representative of all the aforementioned plaintiffs is a citizen of the U.S. of America with residence in San Juan, P.R. and whose mailing address is P.O. Box 902 1903 San Juan, P.R. 00902-1903

The Honorable Court has jurisdiction based on Diversity of Citizenship.

The matters in controversy exceed \$5,000.00 in interests, attorney's fees and costs, U.S. DISTRICT COURT  
SAN JUAN specified in 28 USC § 1332.

This action arises under 42 USC § 1346 (1) (B) (ii), 42 USC 2000 AA, et. al.

This action is also for Breach of Contract, all equitable claims, Breach of Fiduciary Duty, Larceny & Grand, negligence, medical malpractice, legal malpractice, violations of the Civil Rights of Manuel Betancourt, and the violations of the Civil Rights of the children of Manuel Betancourt.

Jose M. Betancourt  
The Plaintiff respectfully reserves the right to amend the Complaint.

If you do not serve a Notice of Appearance and Answer to the within Complaint within the applicable time limitation, a judgment may be entered against you by default in the amount of \$500,000.00 together with attorney's fees, costs, and disbursements of this action.

Dates: San Juan, P.R.  
11 September, 2009.

Joseph. Betancourt  
Plaintiff Pro Se /

Yours, etc.  
J. BT  
P.O. Box 902 1903  
San Juan, P.R. 00902.